

# EXHIBIT 4

ROUGH - David W. Hand

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N O T I C E

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1 THE VIDEOGRAPHER: We are now on the record.  
2 My name is is a Scott pickerring. I'm the  
3 videographer for Golkow Technologies, Inc, 1 Liberty  
4 Place, 1650 Market Street, 1st floor, Philadelphia,  
5 Pennsylvania. Today's date is April 23rd, 2009. The  
6 time is now 9:05 a.m. This video deposition is being  
7 held at 600 13th Street, Northwest, Washington, D.C.  
8 in the matter of the City of New York versus Amerada S  
9 Corporation, et al. to be heard in the United States  
10 District Court for the Southeastern District of New  
11 York. The deponent is David W. Hand, Ph.D., Master  
12 File number 1:00-1898.

13 Will counsel and those present please  
14 identify themselves for the record.

15 MR. MCGILL: Brian McGill from McDermott  
16 Will & Emery representing Exxon Mobile.

17 MR. SHER: Anybody on the phone?

18 MR. SHER: Vic Sher, plaintiff.

19 THE VIDEOGRAPHER: The court reporter today  
20 is Michele Eddy on behalf of Golkow Technologies, Inc.  
21 You may now swear the witness.

22 P R O C E E D I N G S

23 DAVID HAND, Ph.D.,  
24 having been duly sworn, testified as follows:

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1 Q Okay. And if they're right, then there  
2 shouldn't be any offset for PCE, correct?

3 A That is correct.

4 Q Okay. And if they're wrong, in your view if  
5 PCE is present above the MCL, there should be an  
6 offset for PCE, do I understand you correctly?

7 A Yes, sir.

8 Q Now, how would you go about calculating what  
9 that offset would be assuming PCE is present above the  
10 MCL in the water?

11 MR. MCGILL: Object to the form. Let me ask  
12 a predicate question first.

13 Do I understand correctly that you have not  
14 performed any such calculations so far?

15 A No, sir. Not for system 6 for PCE removal.

16 Q No, you haven't?

17 A I have not performed --

18 Q It's the afternoon and I just -- I'm not  
19 trying to trip you up. I just want to be clear here.  
20 Sometimes when I ask a negative in the question, it's  
21 my fault in the question. I apologize.

22 Q Is it your view that if PCE were present  
23 above the MCL in the influent to the station 6 plant  
24 and MTBE were present at the levels assumed in the